

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

UNITED STATES OF AMERICA,)	
Plaintiff,)	
)	
v.)	Docket No. 5:19-cr-00062
)	
YUSUF MOHAMED,)	
Defendant.)	

MOTION FOR DETENTION

NOW COMES the United States of America, by and through its attorney, Christina E. Nolan, United States Attorney for the District of Vermont, and moves for pretrial detention of the above-named defendant pursuant to 18 U.S.C. § 3142(e) and (f).

1. Eligibility for Detention. This defendant is eligible for detention because the case involves an offense under the Controlled Substance Act for which a maximum term of imprisonment of ten years or more is prescribed, and a serious risk that defendant will flee. *See* 18 U.S.C. §§ 3142(f)(1)(C), 3142(f)(2)(A).

2. Reason For Detention. The Court should detain the defendant temporarily to determine if there are conditions of release that will reasonably assure the safety of the community.

3. Rebuttable Presumption. The United States may seek to invoke the rebuttable presumption against the defendant pursuant to 18 U.S.C. § 3142(e). The presumption would apply because the Indictment returned against Defendant Mohamed established probable cause that he committed an offense for which a maximum term of imprisonment of ten years or more is prescribed under the Controlled Substances Act. 18 U.S.C. § 3142(e)(3).

4. Time For Detention Hearing. The United States requests the court conduct the detention hearing after a one-day continuance if necessary. The government believes that the defendant is a drug user and that time is necessary to assess the impact of the defendant's drug use on the possibility of release.

Dated at Burlington, in the District of Vermont, April 11, 2019.

Respectfully submitted,

UNITED STATES OF AMERICA

CHRISTINA E. NOLAN
United States Attorney

By: /s/ Andrew C. Gilman
Andrew C. Gilman
Assistant U.S. Attorney
P.O. Box 570
Burlington, VT 05402-0570
(802) 951-6725
Andrew.Gilman2@usdoj.gov